

**Iowa Department of Education**  
**Bureau of Nutrition and Health Services**  
**State Review Summary Report**  
**Decorah Comm School District (16380000)**  
**Date of Review: October 24<sup>th</sup> – 27<sup>th</sup>, 2017**

**Program Year:** 2018  
**Month of Review:** September  
**Lead Reviewer:** Donna Matlock  
**Org Representative(s):** Cathy Dietzenbach

**Org - Level Findings**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	1 household application was not correctly approved: one line with an income amount was missed in calculations resulting in an increase in benefits to family, from "reduced to free".	Submit copies of letters notifying households of an increase or decrease in benefits. Corrected onsite immediately showing SA parent notification letter and contacted family via phone, no further action required.	CA completed/resolved during onsite visit. No further CA required. DM

**Site - Level Findings: Decorah Middle School (0209)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

**Site - Level Findings: Carrie Lee Elementary School (0409)**

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response

**Org - Level Technical Assistance**

Area	Question	Comments
700 - Resource Management		Gillette Pepsi Co. contract; effective July 1, 2007 - June 30, 2010 is not current. Discussed with SFA, moving forward, to solicit at least 3 vendors and follow all current procurement regulations.
900 - SFA On Site Monitoring	900 a. Was the on-site monitoring of breakfast completed prior to February 1st?	FSD is out on medical leave. SA discussed with SFA about the self-monitoring (located in "Download Forms" in IowaCNP) forms required to be completed by Feb. 1st in the event the FSD has not returned back to work.
1000 - Local School Wellness Policy	1007 For each Off-Site Assessment Tool question (Questions 1000-1006), do the responses provided demonstrate compliance with FNS requirements? If NO, explain.	Board minutes were provided in place of an assessment. SA discussed with SFA, as required by USDA, local wellness policies must be reviewed and assessed of goals every three years. All present at exit conference stated they will follow up with Superintendent (contact person of policy) to ensure an assessment will be conducted.

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		SA shared the DE (Dept. of Educ.) website of resources available and assessment templates.
1200 - Professional Standards	1211 Did Part-time staff meet the training requirements?	SA discussed with SFA that all substitutes require minimum training on food safety, civil rights, and other areas pertaining to specific duties.
1200 - Professional Standards	1219 a. Please describe the frequency (i.e. annually, quarterly, monthly etc.) in which training hours are being tracked. i.e. entered into a tracking mechanism.	SA provided the Iowa training tracking tools and resources for additional training opportunities via email to FS Mgr.
1600 - School Breakfast and SFSP Outreach	1601 How did the SFA inform eligible families about the availability and location of free meals for students via the Summer Food Service Program?	USDA requires all SFA's to promote the SFSP in surrounding areas, through newsletters, posters, media, DE resources and links, district website; regardless whether SFA is not participating in the SFSP.  Discussed with SFA that all are required to promote the SFSP of surrounding areas regardless of not participating in SFSP.
Resource Mgt. Comprehensive Review	2 After including the beginning fund balance, did the SFA have year-end expenses in excess of revenues requiring a general fund transfer to cover the balance?	SA verified \$20,000 transferred from the nutrition fund was to repay the general fund. Funds were borrowed from the general fund to cover the negative balance in the nutrition fund for SY2016. Nutrition fund repaid the loan.  Discussed with SFA that such transactions required documentation indicating the amount of funds borrowed, and repayment due date. Shared with SFA if there are questions or concerns regarding such transactions to contact Denise or Janice Evans in the DE finance department in Des Moines.
Resource Mgt. Comprehensive Review	5 What process did the SFA use to calculate its compliance with the revenue from non-program food requirements in 7 CFR 210.14(f)?	Non-program revenue is not adequately contributing to the non-program food costs. Only 23% revenue of 28% food costs is recovered.  SA recommended the SFA complete another Non-Program Revenue Calculator tool to determine how much funds is required to be compliant. This will assist the SFA in determining where price increases may be applied for non-program foods.

**Site - Level Technical Assistance Decorah Middle School (0209)**

Area	Question	Comments
500 - Offer versus Serve	501 Has the cafeteria staff been trained on Offer vs. Serve? If NO, explain and list the technical assistance provided.	Cashier told a student to get a fruit when student had all required components for a reimbursable meal. Discussed with cashier, her interpretation was for lunch that students must walk away with a fruit. SA shared this is only required for breakfast. As long as a student has a 1/2 cup minimum of a fruit or vegetable and 2 other components for lunch, a student's meal is reimbursable.
500 - Offer versus Serve	502 Is there signage explaining what constitutes a reimbursable meal to students including the requirement to select at least 1/2 cup fruit or vegetable? If NO, explain and list the technical assistance provided.	Discussed with SFA about hanging additional signs to guide students and staff of requirements for a reimbursable meal.
600 - Dietary Specifications and Nutrient Analysis	603 Were any areas identified during the Off-site review requiring technical assistance or corrective action prior to the beginning of the On-site portion of the review? If so, explain.	SFA uses NutriKids Nutrient Analysis for meal planning based on nutrient factors to fall within recommended age group ranges for calories, sodium, carbohydrates (diabetics) and saturated fats. During discussion FS Mgr. learned rather than averaging nutritional information over a months period it should be based on weekly averages. This will allow for additional calories in some components.

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800 - Civil Rights	810 Is the USDA "And Justice for All" poster displayed in a prominent location and visible to recipients of benefits? If NO, describe reason.	Out of 6 sites, 3 sites had posted an 8.5"x11" And Justice For All poster. SA provided 11x17 posters as required by USDA for all sites.
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**Site - Level Technical Assistance Carrie Lee Elementary School (0409)**

Area	Question	Comments
800 - Civil Rights	810 Is the USDA "And Justice for All" poster displayed in a prominent location and visible to recipients of benefits? If NO, describe reason.	SFA had an 8.5 x 11 size poster in a public location. SA provided the SFA with actual posters for all sites.

**Org - Level Commendations**

Description
<ul style="list-style-type: none"> <li>• Benefit documents, as well as all paperwork, were very well organized. • The current application form and guidelines were used, direct certification is downloaded twice a month as required, benefits are accurately and frequently transferred to the POS system, and denied applications were correctly determined. • The correct and current benefit issuance list was available. • All but one applications were correctly determined, signed and dated by the household member and the SFA, were complete with SSN's and case numbers, and all applications were determined within ten days. • Income was only converted to annual when there was more than one frequency of income. • Rollover applications were removed if the household did not apply within thirty days of the school year. • Access to benefit information is correctly limited. • Free meals are extended to all members in the household. • Waivers are provided to applicants and indicate specific fees. • Eligibility is kept confidential. • The SFA has a back-up system for benefit issuance documents and system.</li> </ul>
<ul style="list-style-type: none"> <li>• Meal counts during the on-site review were reasonable when compared to the review month counts. Meal count totals for the month of September were accurate and complete. • Point of Service (POS) counts and filed claims appear accurate. • Students are not overtly identified as free, reduced, or paid during the meal claiming process or during meal observation. • Food Production Records, FPRs, were on file for all meals claimed for reimbursement for the review period. • Cashiers are trained, and daily edit checks are performed.</li> </ul>
<ul style="list-style-type: none"> <li>• The "And Justice for All" civil rights poster was posted in the cafeteria. • The district has taken reasonable steps to ensure access to services are offered for Limited English Proficient households. • Annual civil rights training was provided to food service staff and documented. • A copy of the district's public release was on file, documenting that it was submitted to local media. • The district has taken reasonable steps to ensure that students with special dietary needs are adequately accommodated and that proper documentation is on file. • Ethnic/racial information is collected and the form is completed. • No discrimination was observed. • The current state and federal non-discrimination statements are provided on all material describing the program including letters, pamphlets, and the school's website.</li> </ul>
<ul style="list-style-type: none"> <li>• The correct number of applications were verified and were correctly selected from error prone applications. • All income sources were verified with at least one month's income, and the process was completed on time. • The application(s) selected for verification were confirmed prior to verification. • The SFA had at least one person attend training.</li> </ul>
<ul style="list-style-type: none"> <li>• The district has a current wellness policy on file. • There are guidelines for foods sold on the campus and goals to promote student health, nutrition promotion, nutrition education, and physical activity. • The wellness policy is made available to the public. • Potential stakeholders are made aware of their ability to participate on the wellness committee, and all required stakeholders participated.</li> </ul>
<ul style="list-style-type: none"> <li>• The Food Service Director (FSD) does a great job of menu planning and offering choices. The numerous choices increases participation and provides opportunities for each child to find meal components for lunch that they will eat. • All meal components were available at the beginning of meal service on the days of observation and throughout meal service. • All meals observed met at least the minimum daily requirements. • Menus met weekly and daily meal pattern requirements for each age/grade group within the district and within each building. Documentation indicated that foods purchased and food production ensured meals contained the required components and quantities. CN labels and Manufacturer's Statements, as well as nutrition facts and ingredient labels used for producing meals were on file. • A variety of entrees, fruits, and vegetables were offered throughout the review period for lunch, and included many fresh fruits and vegetables. Daily multiple choices of fruits and vegetables encourages student consumption. The SFA provides a Fruit-Vegetable Bar that encourages students to select a reimbursable meal. • Menus included many homemade entrees, and standardized recipes are used for food production. • Water was available as required. • The staff training agenda covered many important topics and shows a commitment to ensure food program compliance. • Offer vs. Serve, OVS, was correctly implemented. Students have the option to decline any one or two of the five components. • At least two types of milk are offered. • Many low fat and low sodium food items were observed in storage. • Students had sufficient amount of time to eat after receiving meals. • Signage was posted explaining what constitutes a reimbursable meal. A monthly menu is also posted. • Food service staff was polite and respectful to students, other staff, and each other. • The Food Service Director/Manager completed the Menu Worksheet(s) for each school selected for review for a specified week during the review period. • Nutrient analysis was not required.</li> </ul>
<ul style="list-style-type: none"> <li>• The Resource Management section of the Off-Site Assessment tool was completed on time. • Financial records that were reviewed, indicated appropriate and allowable expenditures. The district has a sufficient system of safeguards and accountability practices in place to ensure the safety of the account. • There were no unresolved findings from the previous Administrative Review or from a state audit. • The SFA has a separate financial account for the nonprofit school food service, and net cash resources do not exceed three operating months. • The Paid Lunch Equity, PLE, tool was completed and prices were increased as indicated by the PLE tool. • The SFA effectively utilizes its USDA entitlement for commodities. • Reports are filed on time, and all records are maintained for at least three years plus the current</li> </ul>

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year. • The SFA has a comprehensive written Procurement Plan that includes federal and local thresholds, procurement methods and documentation for all purchases, the plan indicates those responsible for rewarding, reviewing, documenting and monitoring procurement events, and specifications were well-written and comprehensive. • The SFA also has a written Code of Ethics/Conduct which includes conflicts of interest, accepting items of monetary value, disciplinary actions, and checks and balances. • IFBs and RFPs are advertised.

**Site - Level Commendations Decorah Middle School (0209)**

Description
• School Breakfast Program, SBP, outreach was sent out at the beginning of the year to inform families of the availability of the program. • Reminders of the SBP were also sent out throughout the school year. • Outreach included announcements, newsletters, the school website, posters, etc.
• Signage was posted explaining what constitutes a reimbursable meal. A monthly breakfast menu is also posted. • Offer vs. Serve, OVS, was correctly implemented. Students have the option to decline any one of four items offered at breakfast. • Students have a variety of meal components to select at breakfast. Students have a daily choice of a hot or cold breakfast.
• Students may purchase a second entrée and/or a second milk at lunch. Second entrees are correctly documented on production records. • Documentation was available to show that all foods and beverages sold to students during the school day met Smart Snack and Healthy Kids Act standards, including food sold in the cafeteria, vending machines, school stores, and fundraisers. • The Smart Snacks calculator at the Alliance for a Healthier Generation website is used to document items sold a la carte.
• The SFA has a district-wide written Food Safety plan that includes all required elements. A copy of the written plan was available at the site(s) reviewed, and Standard Operating Procedures, SOPs, have been implemented in each kitchen. • The latest Health Inspection Report was posted in a publicly visible location. There were no critical areas noted on the report. • Temperature logs are maintained for all coolers-including milk coolers, freezers, food served, dishwasher, and thermometer calibration. • The kitchen and storage areas were orderly and clean. • Food Service workers wore proper hair restraints and practiced good gloving procedures. • Good food safety procedures were observed. • FSD is very organized and training is done annually on SOP's.